

William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018
T: 212-813-8800
E: wweintraub@goodwinprocter.com
E: gfox@goodwinprocter.com

*Counsel for Hilliard Muñoz Gonzales LLP,
Thomas J. Henry Injury Attorneys, Girard
Gibbs LLP, and Jordan Hyden, Womble and
Culbreth P.C.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	
In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**RESERVATION OF RIGHTS OF
CERTAIN NON-ISD PRE-CLOSING ACCIDENT PLAINTIFFS**

Goodwin Procter, LLP, as counsel to Hilliard Muñoz Gonzales LLP, Thomas J. Henry Injury Attorneys, Girard Gibbs LLP, and Jordan Hyden, Womble and Culbreth P.C., which firms in turn represent the Non-Ignition Switch Pre-Closing Accident Plaintiffs¹ identified on Exhibit A hereto (the “Non-ISD Pre-Closing Accident Plaintiffs”), files this reservation of rights with respect to the Non-ISD Pre-Closing Accident Plaintiffs’ ability to seek to file late proofs of claim at a future date and seek recovery on such claims from the assets of the GUC Trust. In its Decision on Motion to Enforce Sale Order the Court explained that it has deferred consideration

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Judgment entered in the above-captioned chapter 11 case on June 1, 2015 [ECF No. 13177] (the “Judgment”).

of issues relating to Non-Ignition Switch Plaintiffs. *In re Motors Liquidation Co.*, 529 B.R. 510; 522 (Bankr. S.D.N.Y. 2015). Accordingly, the Non-ISD Pre-Closing Accident Plaintiffs hereby reserve the right to, at a future date, file and seek allowance of late claims, seek a recovery on such claims from the assets of the GUC Trust, and litigate issues (i) through (iii) identified in paragraph 13(a) of the Judgment.

Dated: June 24, 2015

Respectfully submitted,

/s/ William P. Weintraub

William P. Weintraub

Gregory W. Fox

GOODWIN PROCTER LLP

The New York Times Building

620 Eighth Avenue

New York, NY 10018

Tel.: 212.813.8800

Fax: 212.355.3333

wweintraub@goodwinprocter.com

gfox@goodwinprocter.com

*Counsel for Hilliard Muñoz Gonzales LLP,
Thomas J. Henry Injury Attorneys,
Girard Gibbs LLP, and Jordan Hyden,
Womble and Culbreth P.C.*